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REMARKS

In paragraph 6 of the office action, the Examiner objects to Claims 1 and 13 as they should be labeled "currently amended". The applicant has amended the claims according to C.F.R 116(a)(1), the applicant respectfully submits that claims 1 and 13 as amended are in condition for allowance, which allowance is respectfully requested.

In paragraph 8, the Examiner rejects claims 1-4, 6-16, 18-28 and 30-37 under 35 U.S.C. 103(a) over Kozma (5,983,169) in view of Chanod (6,269,189). The Examiner says as to Claims 1, 13 and 25, Kozma teaches "a) analyzing a first phrase in its immediate context in the first text for the existence of a first translation to a unique phrase in the second text in the second language; b) translating the first phrase to a unique second phrase in the second text if the first translation is found to exist; d) then, (using the additional context obtained,) translating the first phrase to a second phrase in the second text in the second language if the first translation is not found to exist."

The Examiner admits that Kozma does not teach "c) obtaining additional context using a link related to the first text if the unique phrase is not found;" The Applicant submits that since Kozma does not teach the obtaining step, Kozma does not teach or imply the using step of "d) then, **using the additional context obtained** (emphasis added), translating the first phrase to a second phrase in the second text in the second language if the first translation is not found to exist. The Examiner says that "Chanod teaches an annotation system (col 17, lines 56-57), suggesting the use of links, for providing extra translation informaion to the user (hyperlinks, providing the user with translations, col 17, lines 56-66). Therefore, it would have been obvious to a person of ordinary skill in the art at the time of

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the invention to have added Chanond's feature of extracting information through hyperlinks to the translation system of Kozma, to have 'interactive aids for consulting on-line documents' to clarify ambiguous words as taught by Chanond (col. 17, lines 16-26). The applicant disagrees.

Chanond is directed to detecting character strings in order to automatically annotate a matched character string. The character string search does not involve any annotation, in fact, the annotation is not determined until the corresponding search is complete:

"In executing search/annotate routines 142, processor 122 can use input text 156, finite state lexicon 152, and tokenizing automation 154 to automatically search for character strings in input text 156 that match any of selected expressions 150. Search/annotate routines 142 thus implement the acts in boxes 50 and 52 in FIG. 2, and are an implementation of instructions 94 in FIG. 3.

Upon finding a matching string, search/annotate routines 142 also determine whether to perform an operation relating to the matching string. More specifically, routines 142 determine whether to annotate input text 156 by inserting an annotation in association with the matching string. The annotation can include information accessed in lexicon 152, information accessed in miscellaneous data items 160, or information obtained from elsewhere. Routines 142 thus produce annotated text 156, which can be provided as output, such as by presenting it on display 124. " Chanod Col 11 lines 32-48)

Thus, any combination of Chanond and Kozma would result in a system that performs a text search as taught by either Chanond or Kozma resulting in an annotating step as taught by Chanond where the annotation would be applied following any search operation. The fact that Chanond contemplates applying a variety of annotations including "hyperlinks in a World Wide Web applications" (Chanond Col 17 lines 62-63) can not be construed as "c) obtaining additional context using a link related to the first text if the unique phrase is not found;" as shown in the claims. The Chanond annotation comprises a link. Chanond is silent on "obtaining additional context if the unique phrase is not found" as shown in the claim. Chanond only finds an annotation when a unique phrase is found. Furthermore Chanond is silent on using a link to obtain context of any sort much less "additional

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context" as shown in the claim. Furthermore, Chanond and Kozma alone or in combination do not teach "then, using the additional context obtained, translating the first phrase to a second phrase in the second text in the second language if the first translation is not found to exist." As shown in the claim. Both Chanond and Kozma perform a continuous search and neither provide for a link to "additional context" as taught by the present invention.

In paragraph 3, the Examiner argues that the use of links (as shown for example in Claims 1 and 3) to provide extra translation information is well known but fails to provide a reference that teaches this element of the invention.

According to *In re Zurko*, 258 F.3d 1379, 59 U.S.P.Q.2d 1693 (Fed. Cir 2001) "the Board cannot simply reach conclusions based on its own understanding or experience -- or on its assessment of what would be basic knowledge or common sense. Rather, the Board must point to some concrete evidence in the record in support of these findings". The applicant respectfully requests the examiner provide evidence to his assertion (Also MPEP 2144.03C).

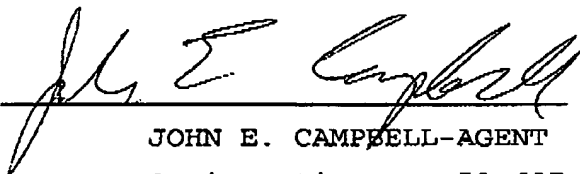
The Applicant respectfully requests that the Examiner provide evidence that a link (such as a Hyperlink of the World Wide Web) is used to provide additional context for a word analyzer and a reference within the citations that would motivate one of average skill in the art to combine in a way that produces the present invention. Therefore, the applicant submits that the independent Claims 1, 13 and 25 are allowable, which allowance is respectfully requested. Furthermore, claims 2-12, 14-24 and 26-37 are allowable as amended are in condition for allowance as they depend on respectively allowable independent claims, which allowance is respectfully requested.

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It is respectfully submitted that the application is now in condition for allowance, which allowance is respectfully requested.

RESPECTFULLY SUBMITTED

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